

REMARKS

I. Introduction

In response to the Office Action dated February 15, 2006, subsequent to the Notice of Appeal filed February 27, 2006, and in conjunction with the Request for Continued Examination (RCE) submitted herewith, claims 1, 5, 8, 13, 14, 17 and 19 have been amended. Claims 1 and 3-20 remain in the application. Re-examination and re-consideration of the application, as amended, is requested.

II. Non-Art Rejections

On page (2) of the Office Action, claims 1 and 3-20 were rejected under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement.

Applicants' attorney has amended claims 1, 13, 14 and 17 to overcome this rejection.

III. Prior Art Rejections

On page (4) of the Office Action, claims 1, 3, 4, 8-10 and 13-20 were rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,038,560 to Wical. On page (10) of the Office Action, claims 5-7, 11 and 12 were rejected under 35 U.S.C. §103(a) as being obvious over U.S. Patent No. 6,038,560 to Wical as applied to claims 1, 3, 4, 8-10 and 13-20 above, and further in view of U.S. Patent No. 5,933,822 to Braden-Harder.

Applicants' attorney respectfully traverses these rejections in light of the amended claims above.

Applicants' independent claim 1 now recites a computer-implemented method of retrieving information, comprising: performing a pre-processing stage by parsing documents contained in a collection with a grammar in order to identify one or more concepts contained therein, and assigning concept labels to the documents contained in the collection based on the identified concepts. Applicants' independent claim 1 also recites performing a post-processing stage by applying the grammar to a query to convert the query to a query concept and mapping the query concept to a concept label that matches the query concept. (Independent claims 13, 17 and 19 recite similar limitations.)

Note that Applicants' independent claims recite that the same grammar or grammar rules used to process documents to identify concepts therein, are also used to process queries to identify concepts therein, so that the query concepts can be matched to the document concepts.

Neither Wical or Braden-Harder teach similar limitations.

Wical merely describes how the content processing system analyzes the thematic, contextual, and stylistic aspects of the documents, generates a document theme vector, and then attempts to classify each theme. To accomplish this, the content processing system of Wical is comprised of a linguistic engine, which includes a grammar parser and a theme parser, that processes the document set by analyzing the grammatical or contextual aspects of each document, as well as analyzing the stylistic and thematic attributes of each document.

Specifically, consider the following locations in Wical, which are the only locations in Wical that discuss the use of a grammar:

Wical: Col. 27, lines 15-58

FIG. 13 is a block diagram illustrating one embodiment for a content processing system. In general, the content processing system 110 analyzes the document set 130 and generates the document theme vector 160. For this embodiment, the content processing system 110 includes a linguistic engine 700, a knowledge catalog processor 740, a theme vector processor 750, and a morphology section 770. The linguistic engine 700 receives, as input, the document set 130, and generates, as output, the structured output 710. The linguistic engine 700, which includes a grammar parser and a theme parser, processes the document set 130 by analyzing the grammatical or contextual aspects of each document, as well as analyzing the stylistic and thematic attributes of each document. Specifically, the linguistic engine 700 generates, as part of the structured output 710, contextual tags 720, thematic tags 730, and stylistic tags 735 that characterize each document. Furthermore, the linguistic engine extracts topics and content carrying words 737, through use of the thematic tags 730, for each sentence in the documents. For a detailed description of the contextual and thematic tags, see U.S. patent application Ser. No. 08/454,745, inventor Kelly Wical, entitled "Content Processing System for Disclosure", filed May 31, 1995, that includes an Appendix C, entitled "Analysis Documentation."

In one embodiment, the linguistic engine 700 generates the contextual tags 720 via a chaos loop processor. All words in a text have varying degrees of importance in the text, some carrying grammatical information, and others carrying the meaning and content of the text. In general, the chaos loop processor identifies, for words and phrases in the documents, grammatical aspects of the documents including identifying the various parts of speech. In order to accomplish this, the chaos loop processor ascertains how the words, clauses and phrases in a sentence relate to each other. By identifying the various parts of

speech for words, clauses, and phrases for each sentence in the documents, the context of the documents is defined. The chaos loop process stores information in the form of the contextual tags 720. U.S. patent application Ser. No. 08/454,745, now U.S. Pat. No. 5,694,523, inventor Kelly Wical, entitled "Content Processing System for Discourse", filed May 31, 1995, includes an Appendix B, entitled "Chaos Processor for Text", that contains an explanation for generating contextual or grammatical tags.

Wical only describes the use of a grammar when processing documents. Nowhere does Wical describe using the same grammar when processing queries as was used in processing documents. Applicants' independent claims, on the other hand, do use the same grammar to process documents as to process queries.

Braden-Harder fails to overcome these deficiencies of Wical. Recall that Braden-Harder was only cited against dependent claims 5-7, 11 and 12, and only for teaching crawlers that index HTML documents on the Internet.

Thus, Applicants' attorney submits that independent claims 1, 13, 17 and 19 are allowable over Wical and Braden-Harder. Further, dependent claims 2-12, 14-16, 18 and 20 are submitted to be allowable over Wical and Braden-Harder in the same manner, because they are dependent on independent claims 1, 13, 17 and 19, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 2-12, 14-16, 18 and 20 recite additional novel elements not shown by Wical and Braden-Harder.

IV. Conclusion

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited.

Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

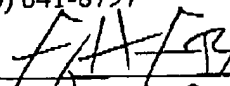
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